

Exhibit 18

Plaintiff Jane Doe #1 Declaration

Plaintiff has moved to file an unredacted version of this document under seal.

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
WESTERN DIVISION**

JANE DOE #1, on behalf of herself and)
all others similarly situated,)

Plaintiffs,)

v.)

CIVIL ACTION NO:
7:21-cv-00220-LSC

MG FREESITES, LTD, d/b/a)
"PORNHUB"; MG FREESITES II)
LTD; MINDGEEK S.A.R.L.;)
MINDGEEK USA INCORPORATED;)
MG CY HOLDINGS LTD;)
MINDGEEK CONTENT RT LIMITED;)
9219-1568 QUEBEC, INC., d/b/a)
MINDGEEK; MG BILLING LTD,)

Honorable L. Scott Coogler

Defendants.)

DECLARATION OF JANE DOE #1

1. My name is [REDACTED] My date of birth is [REDACTED] I

am the Jane Doe #1 plaintiff in this case.

2. I fully support this class action against the Defendants to bring justice for every child whose abuse was depicted on their websites.

3. I have been actively involved in this case since I first contacted my attorneys regarding what happened to me.

4. In early 2018, when I was sixteen years old, [REDACTED]

filmed me engaging in a sexual act in his car.

5. Sometime in late 2018 or early 2019, [REDACTED] drugged me with an unknown pill and filmed himself raping me.

6. At least two videos of me appeared on Pornhub under [REDACTED] Pornhub account at some point after they were filmed.

7. I became aware of those videos around June of 2020 when a girl referred to me as "that girl from Pornhub."

8. I contacted law enforcement to report the videos.

9. [REDACTED] was convicted of disseminating child pornography.

10. One of the videos included the word "Lil" in the title.

11. From the time I learned there was a video of me on Pornhub, I have been embarrassed and haunted by the thought of it.

12. I engaged legal counsel, and they have helped me bring this lawsuit.

13. I have cooperated and participated in discovery, and I will do anything that is required of me as the plaintiff in this case.

14. I fully support this class action lawsuit, and I am ready to see it through to the end of the litigation.

Pursuant to 28 U.S. Code § 1746, I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: September 8, 2023